

1 PHILLIP A. TALBERT
2 United States Attorney
3 JESSICA MASSEY
4 Assistant United States Attorney
5 2500 Tulare Street, Suite 4401
6 Fresno, CA 93721
7 Telephone: (559) 497-4000
8 Facsimile: (559) 497-4099

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11 Attorneys for Plaintiff
12 United States of America

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14 IN THE UNITED STATES DISTRICT COURT
15 EASTERN DISTRICT OF CALIFORNIA

16
17 UNITED STATES OF AMERICA,
18 Plaintiff,
19 v.
20 RAYLON THIJAY RANDLE,
21 Defendant.

22 CASE NO. 1:21-CR-00246-DAD-BAM
23 STIPULATION REGARDING EXCLUDABLE
24 TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER
DATE: December 14, 2022
TIME: 1:00 p.m.
COURT: Hon. Magistrate Judge Barbara A. McAuliffe

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28 **STIPULATION**

29 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
30 through defendant's counsel of record, hereby stipulate as follows:

31 1. By previous order, this matter was scheduled for a status conference on December 14,
32 2022.

33 2. By this stipulation, the parties move to continue the status conference until February 8,
34 2023, and to exclude time from calculation under the Speedy Trial Act between December 14, 2022, and
35 February 8, 2023.

36 3. The parties agree and stipulate, and request that the Court find the following:
37 a) Initial discovery was provided to defendant on or about October 18, 2021,
38 consisting of 114 Bates-stamped items including reports of investigation, body worn camera
39 recordings, photographs, certified conviction records and a summary of defendant's criminal

1 history.

2 b) The government transmitted a plea offer to counsel for defendant on February 15,
3 2022.

4 c) Counsel for defendant desires additional time to review discovery, consult with
5 her client, conduct investigation and research related to the charges.

6 d) Counsel for defendant believes that failure to grant the above-requested
7 continuance would deny her the reasonable time necessary for effective preparation, taking into
8 account the exercise of due diligence.

9 e) Based on the above-stated findings, the ends of justice served by continuing the
10 case as requested outweigh the interest of the public and the defendant in a trial within the
11 original date prescribed by the Speedy Trial Act.

12 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
13 et seq., within which trial must commence, the time period of December 14, 2022 to February 8,
14 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it
15 results from a continuance granted by the Court request on the basis of the Court's finding that
16 the ends of justice served by taking such action outweigh the best interest of the public and the
17 defendant in a speedy trial.

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1 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
2 Speedy Trial Act provide that additional time periods are excludable from the period within which a trial
3 must commence.

4 IT IS SO STIPULATED.

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6 Dated: December 9, 2022

7 PHILLIP A. TALBERT
United States Attorney

8 _____
9 /s/ JESSICA MASSEY
JESSICA MASSEY
10 Assistant United States Attorney

11 Dated: December 9, 2022

12 _____
13 /s/ CHRISTINA CORCORAN
CHRISTINA CORCORAN
14 Counsel for Defendant
RAYLON THIJAY RANDLE

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16 **ORDER**

17 IT IS SO ORDERED that the status conference is continued from December 14, 2022, to **February**
18 **8, 2023, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe.** Time is excluded pursuant to
19 18 U.S.C. § 3161(h)(7)(A), B(iv).

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21 IT IS SO ORDERED.

22 Dated: December 9, 2022

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/s/ *Barbara A. McAuliffe*

24 UNITED STATES MAGISTRATE JUDGE